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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18<sup>TH</sup> STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

September 3, 2003

Ref: 8EPR-SR

Mr. Mike Weigel Putman & Associates 321 SW Higgins Missoula, MT 59803

RE: FOIA Request # 8RIN 370-03 dated July 28, 2003

Dear Mr. Weigel:

Pursuant to your FOIA request, I have enclosed information regarding each property you referenced in the attached table. Because the overall investigation and cleanup program is somewhat complicated, the information requires some interpretation. The information we are providing clearly answers the first and third questions you put forward, but we are unable to clearly answer the second question. Our cleanup program is based on many factors, but in general, for each particular home, we are unable to say for sure if, and how much, actual exposure to Libby asbestos is occurring or has occurred in the past. The presence of asbestos containing materials is easy to assess - actual exposure is much harder and is dependent on numerous factors. Those reading the results presented in the table should interpret the information carefully.

#### **Property Activities**

- CSS stands for contaminant screening study. This was the first phase of investigation for residential/commercial properties and was intended to screen for potential sources of Libby asbestos, such as vermiculite insulation. This program is mostly complete but some properties have not yet been completed for various reasons.
- RI stands for remedial investigation. This was the second phase of investigation for residential/commercial properties and involved follow up visits to obtain additional information for certain properties.
- Pre-Design is an additional inspection for properties that have been earmarked, for whatever reason, for cleanup. Intent is to collect additional information at each property to aid in developing a detailed cleanup plan.
- Cleanup speaks for itself.

#### Secondary Source Indication

Generally, we interview residents to determine if a "secondary" source may have



contributed to any potential contamination. These "sources" include things such as working at the former vermiculite mine or processing centers. Generally, if an indication of a secondary source is present, we will conduct some additional RI investigation work such as indoor dust sampling.

### Observed Vermiculite

- In many circumstances, the presence of visible vermiculite at a property will spur cleanup action by EPA. While visible vermiculite (insulation, vermiculite in soils, etc.) is a good indicator for the presence of Libby asbestos, its presence does not always imply the presence of "unsafe" levels of asbestos, nor imply a specific level of asbestos. Our approach to using visible vermiculite as a trigger for cleanup was made considering various factors including cost effectiveness of sampling vs. visual inspection, potential for future exposure, and community perception. Again, presence of visible vermiculite may spur cleanup, but does not necessarily imply current or past exposure.
- Visible vermiculite may be handled in different ways depending on its location. In some
  cases, it will be removed. In others, it will be contained. In others, it will spur additional
  sampling. Each decision is based on several standard procedures as well as the specifics
  of the property.

### Samples Collected and Results

- In cases where samples are required to determine if cleanup is necessary, they may be collected in various media. Each property is different and additional samples are collected as the investigation/cleanup program proceeds at each property.
- Results generally show the highest reading (e.g. if five soil samples were collected, and four were non-detect, but one had trace, the column will show trace).
- EPA is currently in the process of developing a document which sets forth action levels for emergency response cleanup. We have not yet established site-specific values of what levels of asbestos are "safe" or "unsafe" for the long-term. This will not be completed for several years. In general, for the emergency response cleanup, asbestos levels in soil greater than 1% and dust levels greater than 5000 fibers per square centimeter spur cleanup. Bulk samples (vermiculite insulation) and air samples are generally not used to determine if cleanup is necessary, but may be used otherwise.

If you have any additional questions regarding this information, please call me at (303) 312-6748.

Sincerely,

Jim Christiansen

Remedial Project Manager

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# FOIA Request Property Summary

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